Slavery and Human Trafficking Statement for ASSA ABLOY Limited (ASSA ABLOY) for the year ended 31 December 2020

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that ASSA ABLOY has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ASSA ABLOY has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

ASSA ABLOY Limited (ASSA ABLOY Opening Solutions UK & Ireland) is the primary UK subsidiary of ASSA ABLOY AB, a company quoted on the Swedish Stock Exchange. The ASSA ABLOY Group is the global leader in access solutions and provides opening solutions, trusted identities, entrance automation and service for institutional and commercial customers, as well as for the residential market.

In the UK, ASSA ABLOY Opening Solutions UK & Ireland is the UK's leading supplier of safety and security door solutions across a range of markets. We operate divisionally through our Door Group, Door Hardware Group, High Security & Safety Group and Project Specification Group. The company's strength lies in its brands which include some of the best known and most trusted names in security: ABLOY, Union, Dale Hardware, Chubb Locks Custodial Services, Mul-T-Lock, Traka and Yale for instance. Each of our brands complements the others with its different strengths, allowing us to offer tailored solutions for all our clients. Our vision is to be the most innovative supplier of total door opening solutions that deliver safe and convenient security solutions and add real value to customers. We have the most comprehensive product and solution offer of any manufacturer which covers all needs for door opening solutions and service for institutional and commercial customers, as well as for the residential market.

Our supply chain spans worldwide, all supporting local markets like the UK.

Our high risk areas

ASSA ABLOY believes in responsible social and ethical behaviour and has a responsibility to the people serving the company worldwide. People whose work contributes to the company's success should not be deprived of their basic human rights or be forced to suffer physically or mentally from their work.

ASSA ABLOY ensures all employees are paid in-line with the local Government minimum wage guidelines and ensures all employees are treated fairly and awarded appropriately for their endeavours and not exploited in any way. All employees undergo vetting, induction and training processes appropriate for their role within our business.

Furthermore, ASSA ABLOY, its employees and business partners have an obligation to all stakeholders to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine employee and customer trust. This is the foundation for and the reason why ASSA ABLOY has created the ASSA ABLOY Code of Conduct, applicable not only to all ASSA ABLOY employees, but all suppliers and personnel working for and on behalf of ASSA ABLOY.

ASSA ABLOY Limited
School Street
Willenhall
West Midlands
WV13 3PW
Web: www.assaabloyopeningsolutions.co.uk

ASSA ABLOY sources goods and services directly from a global network of suppliers, including many based in low cost countries. Our due diligence checks on external suppliers together with written confirmation that;

- they have read our supplier Code of Conduct;
- no part of their business operations contradicts the Code of Conduct or other modern slavery legislation and guidelines; and
- they treat workers fairly and pay at least the prevailing minimum wage

minimise our risks of non-compliance.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Code of Conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers

ASSA ABLOY operates a preferred supplier policy and maintains a preferred supplier list. We conduct due diligence on suppliers before allowing them to become a preferred supplier. This due diligence can include online searches to ensure that particular organisations have never been convicted of offences relating to modern slavery and on-site audits which include a review of working conditions. Ongoing sustainability audits of our low cost country suppliers are performed throughout the term of our relationship with them. Suppliers are asked to confirm that no part of their operations contradicts our supplier Code of Conduct which includes appropriate conduct in respect of modern slavery and human trafficking.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that;

1. they have taken steps to eradicate modern slavery within their businesses;
2. they hold their own suppliers to account over modern slavery;
3. for international suppliers in low cost countries, they pay their employees any prevailing minimum wage applicable within their country of operations; and
4. we may terminate our contract with them at any time should any instances of modern slavery become apparent.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

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Responsibility for the statement

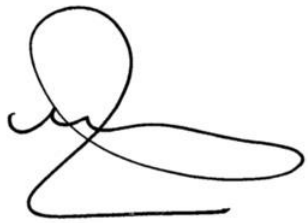
The ASSA ABLOY Executive Management team has overall responsibility for ensuring policies and procedures comply with the ASSA ABLOY AB Groups legal and ethical obligations and that all those under our control comply with them. The ASSA ABLOY Market Region Manager has primary responsibility for overseeing the implementation of the Groups policies and procedures. This includes responsibility for the monitoring of their use and effectiveness and the updating of policies to reflect changes in legislation.

Management at all levels within ASSA ABLOY are responsible for ensuring that those reporting to them understand and comply with all relevant policies and procedures and are given adequate training on modern slavery.

ASSA ABLOY believes in social and environment responsibility and ethical conduct and expects its employees and business partners to do the same. We continually work to improve our policies and procedures to enable us to continue to grow and develop with long-term sustainability and ethical conduct in mind. This also includes building sustainable and ethical relationships with our business partners.

Approval

This statement was approved by the board of Directors of ASSA ABLOY Limited at their meeting on 23 June 2021 and signed on its behalf by:



Harry Warrender
Market Region Manager
ASSA ABLOY Limited
Registered Number: 02096505
23 June 2021